

March Conference

1) Purposes and Goals of Conference

a) establish efficient communication, data collection, and data exchange among government and private attorneys presently engaged in litigation with Scientology organizations and investigations of Scientology activities.

b) secure services of associate counsel & represent potential claimants outside of Massachusetts who as yet have not commenced litigation.

c) establish consulting and referral systems among attorneys engaged in Scientology litigation.

2) Lead Counsel - conference format to be based on presentations by attorneys experienced in handling Scientology litigation.

- Michael Flynn (Boston)
- McMurtry & Wade (Portland)
- Cunningham & Logans (Tampa)
- Kenneth Staroszk (Albany)

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- John Posner (L.A.)
- J. Reilly & Clark (L.A.)
- representatives of Internal Revenue Service and United States Attorney's Office
- representatives of American Medical Association

3) Associate Counsel :- conferees & consist

a) private and government attorneys presently engaged in Scientology

b) counsel who are interested in presenting potential claimants who wish to seek legal redress but who are not yet involved in litigation (see "Attorney Solicitation Program")

4) Attorney Solicitation Program - methods of securing associate counsel to represent claimants outside of Massachusetts

a) telephone referral system; professional announcements (A+L, ABA, local bar periodicals)

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1) Follow up letters

2) attorneys' informational package
(history of litigation, nature
of potential claims, damage
evaluation; legal evaluation;
fee proposal, cost proposal)

3) Conference Format

4) ~~speakers to include:~~
a) lead counsel, Jean Methvin,
Duke and Margaret Switzer,
E. Ron Hubbard Jr., Betty
Orsini, Julie Christofferson,
Pauline Cooper, Gabe Cezares,
Citizens Freedom Foundation.

5) Press coverage:

- news media: L.A. Times,
ABC, CBS, NBC, Reader
Digest, Washington Post, St.
Louis Post-Dispatch, Chicago
Tribune, Las Vegas Review
Journal, local TV.

- professional publications;
American Lawyer, Trial
Magazine, Case & Comment,

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local bar publications

c) Seminar Topics:

i) introduction - L. Ron Hubbard, history of Sci, internal structure, financial structure, auditing, collection, use, and misuse of information, beg structure, covert and illegal activities, Cooper case, Cegnes case, Washington convictions, Christensen case, Island case, doctrines of air game and disarmament

ii) Theories of liability - fraud and misrepresentation, intentional infliction of emotional distress, libel & slander, invasion of privacy, breach of fiduciary duty, Fair Labor Standards Act, Racketeering Influenced and Corrupt Organizations Act, conspiracy, money had and received.

iii) Documents - Washington documents, official Scientology publications, financial reports, tax returns and IRS audits, newspaper articles,

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Reader's Digest article, pleadings
in pending cases, legal
memoranda, court decisions,
deposition transcripts, clients
affidavits, Scientology corres-
pondance

IV. Witnesses - expert testimony
on psychological and psychiatric
issues, handwriting issues,
and financial issues; ex-
Scientologists; ex-guardians;
L. P. Hubbard, Jr.; FBI and
IRS agents.

V. Legal issues - First Amendment,
state court jurisdiction over
Church of Scientology of California,
Privileges, statutes of limitations,
waivers and releases, conspiracy
theories, counterclaims.

VI. Damage issues - cash paid,
F.L.S.I. computations, psycho-
measures of psychic damage,
measures of punitive damage.

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vii. Security Considerations - "false" clients, electronic surveillance, mail security, burglary, telephone harassment of clients, blackmail.

viii. Data Collection and Exchange - issues ~~and~~ include

- development of Scientology data banks (names, dates, financial data, deposition results, legal documents, witnesses, miscellaneous information).
- access security
- integration of government and private sources
- collection and monitoring of financial activity data.

ix. Litigation Support and Consultation - issues include -

- development of routine litigation support and consultation service between ~~pro~~ private and government attorneys engaged in Scientology litigation
- integration of organizational file data (AMA, IRS,

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Dep't of labor, private counsel
Treasury, DEA).

- adoption of ALTA model
for complex litigation resource
sharing.

I Fee arrangements - negotiation
of suitable fee arrangements
with associate counsel.

II - key lawsuit concept -
... gration of litigation
support services for associate
counsel. Concept maximizes
collective use of legal work
significantly reduces effectiveness
of Scientology defense tactics
of harassment defense.

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SUMMARY OF OBLIGATIONS

| | | | |
|--------------------------------|-------------|------------|------------|
| Major's House | \$ 107,854. | 306,000 | 426,831 |
| Jewel Ferry | 112,602 | 300,000 | 441,000 |
| Stone House | | | |
| Judy Martin | 334,955 | 468,000 | 1,019,955 |
| Dr. Lawrence Wright | 450,000 | 1,200,000 | 2,550,000 |
| Peter Moore | 256,510 | 408,000 | 913,520 |
| Ernest Hartwell | 172,000 | 322,000 | 1,522,000 |
| James Morris | 124,000 | 224,000 | 648,000 |
| Ed. May - Hill | 172,000 | 322,000 | 1,522,000 |
| Pauline Cooper | 2,000,000 | 5,000,000 | 10,000,000 |
| Torja Burdett | 5,352,000 | 8,402,852 | 13,114,852 |
| Shore Martin | 169,703 | 8324,000 | 2,592,406 |
| Chas. Robinson - Carter | | | |
| Ch. J. de la Cruz (indirectly) | 331,048 | 631,048 | 1,119,122 |
| Shore Martin (indirectly) | 252,888 | 352,888 | 1,081,088 |
| | 9,835,552 | 18,960,150 | 35,318,197 |

Chas. Nelson - Boston 50,000,000 100,000,000 200 mill.